

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

In re:

PARAGON INDUSTRIES, INC.,  
Debtor.

Case No. 25-80433-PRT  
Chapter 11

**STIPULATION AND AGREED ORDER REGARDING CLAIMED  
PROPERTY OF CTAP, LLC AND SOONER PIPE, LLC**

This stipulation and agreed order (this “Stipulation”) is entered into by and among (i) Debtor Paragon Industries, Inc. (the “Debtor”) and (ii) CTAP, LLC and Sooner Pipe, LLC (collectively, “CTAP”).

WHEREAS, on May 30, 2025, the Court entered its *Interim Order on Debtor’s Emergency Motion for Interim and Final Orders Authorizing Use of Cash Collateral, Granting Adequate Protection* [Doc. 132] (the “Cash Collateral Order”), which included the following provisions: “[W]ithin the next 7 days, the Debtor shall not sell or otherwise dispose of any of the property listed on **Exhibit B** attached hereto, which is property owned or claimed as owned by CTAP, LLC or Sooner Pipe, LLC without the prior authorization of the Court, CTAP, LLC, or

Sooner Pipe, LLC. Except as provided in the following sentence, within the next 7 days, the Debtor shall not move any of the property listed on Exhibit B without the prior authorization of the Court, CTAP, LLC, or Sooner Pipe, LLC. Within the next 7 days, the Debtor may move any of the property listed on Exhibit B currently located in the Miller yard to the Sapulpa yard only with the oversight of CTAP, LLC, or Sooner Pipe, LLC. No later than June 6, 2025, the Debtor and CTAP shall either: (i) submit an agreed order addressing the potential for sale, movement, turnover, and other disposition of property owned or claimed as owned by CTAP, LLC or Sooner Pipe, LLC; or (ii) request an emergency hearing on such issues by way of an appropriate motion.”

WHEREAS, the Debtor and CTAP wish to extend dates and deadlines in the above-referenced provisions by an additional 7 days.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

1. Through and including June 13, 2025, the Debtor shall not sell or otherwise dispose of any of the property listed on **Exhibit B** attached to the Cash Collateral Order, which is property owned or claimed as owned by CTAP, LLC or Sooner Pipe, LLC without the prior authorization of the Court, CTAP, LLC, or Sooner Pipe, LLC. Except as provided in the following sentence, through and including June 13, 2025, the Debtor shall not move any of the property listed on Exhibit B without the prior authorization of the Court, CTAP, LLC, or Sooner Pipe, LLC. The Debtor may move any of the property listed on Exhibit B currently located in the Miller yard to the Sapulpa yard only with the oversight of CTAP, LLC, or Sooner Pipe, LLC. No later than June 13, 2025, the Debtor and CTAP shall either: (i) submit an agreed order addressing the potential for sale, movement, turnover, and other disposition of property owned or claimed as owned by CTAP, LLC or Sooner Pipe, LLC; or (ii) request an emergency hearing on such issues by way of an appropriate motion.

2. The Debtor shall serve a copy of this Stipulation on all parties in interest.

IT IS SO ORDERED.

# # #

APPROVED:

/s/ Clayton D. Ketter

Clayton D. Ketter, OBA No. 30611  
Jason A. Sansone, OBA No. 30913  
PHILLIPS MURRAH P.C.  
424 N.W. 10th St., Suite 300  
Oklahoma City, OK 73103  
(405) 235-4100 - telephone  
(405) 235-4133 - facsimile  
[cdketter@phillipsmurrah.com](mailto:cdketter@phillipsmurrah.com)  
[jasansone@phillipsmurrah.com](mailto:jasansone@phillipsmurrah.com)  
**Proposed Attorneys for Debtor**

/s/ Eric M. English

PORTER HEDGES LLP  
Eric M. English (pro hac vice)  
Stephen H. Lee (pro hac vice)  
Megan Young-John (pro hac vice)  
Lakshmi N. Kumar (pro hac vice)  
1000 Main Street, 36th Floor  
Houston, TX 77002  
Telephone: (713) 226-6000  
Facsimile: (713) 226-6225  
Email: [eenglish@porterhedges.com](mailto:eenglish@porterhedges.com)  
[slee@porterhedges.com](mailto:slee@porterhedges.com)  
[myoung-john@porterhedges.com](mailto:myoung-john@porterhedges.com)  
[lkumar@porterhedges.com](mailto:lkumar@porterhedges.com)  
**Attorneys for CTAP, LLC, and Sooner Pipe, LLC**